

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN,	:	
	:	Civ. No. 09 Civ. 5900 (RPP)
Plaintiffs,	:	
	:	
- against -	:	
	:	
BANK OF NEW YORK, JP MORGAN	:	
CHASE, SOCIETE GENERALE, and	:	
CITIBANK,	:	
	:	
Defendants.	:	
-----	:	
THE BANK OF NEW YORK MELLON,	:	
JPMORGAN CHASE BANK, N.A., SOCIETE	:	
GENERALE and CITIBANK, N.A.,	:	
	:	
Third-Party Plaintiffs,	:	
	:	
- against -	:	
	:	
STEVEN M. GREENBAUM, STEVEN M.	:	
GREENBAUM (as administrator of the estate of	:	
JUDITH GREENBAUM), ALAN D.	:	
HAYMAN, SHIRLEE HAYMAN, <i>et al.</i> ,	:	
	:	
Third-Party Defendants.	:	
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RESPONSE OF DEFENDANT/THIRD-PARTY PLAINTIFF CITIBANK N.A. TO THE
AFFIRMATIVE STATEMENT OF MATERIAL FACTS OF GREENBAUM AND
ACOSTA JUDGMENT CREDITORS

Pursuant to Local Rule 56.1 of the United States District Court for the Southern District of New York, Defendant/Third-Party Plaintiff Citibank, N.A. (“Citi”) hereby submits the following Response to the Affirmative Statement of Material Facts of Greenbaum and Acosta Judgment Creditors, dated September 13, 2010.

66. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

67. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

68. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

69. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

70. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

71. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

72. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

73. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

74. Undisputed.

75. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

76. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

77. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

78. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

79. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

80. This paragraph has been completely redacted. Citi therefore lacks information sufficient to respond to this assertion of undisputed material fact.

81. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

82. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

83. Undisputed.

84. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

85. Citi notes that the Bonk and Valore third-party defendants filed an answer to the third-party complaint.

86. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

87. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

88. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

89. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

90. Undisputed.

91. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

92. Citi lacks information sufficient to respond to this assertion of undisputed material fact, except that Citi states that it has interpled third-party defendant entities and judgment creditors.

93. Citi lacks information sufficient to respond to this assertion of undisputed material fact.

Dated: New York, New York
September 27, 2010

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/Sharon L. Schneier
Sharon L. Schneier

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*Attorneys for Defendant/Third-Party Plaintiff
Citibank, N.A.*